

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ZACHARY GIAMBALVO, JOHN MOUGIOS,  
SHANE MASHKOW, KEVIN MCLAUGHLIN,  
MICHAEL MCGREGOR, FRANK MELLONI,  
and RENAISSANCE FIREARMS INSTRUCTION,  
INC., and all similarly situated individuals,

Plaintiffs,

22 Civ. 04778 (GRB)(ST)

-against-

SUFFOLK COUNTY, New York,  
Police Commissioner RODNEY HARRISON,  
in his Official Capacity, MICHAEL  
KOMOROWSKI, Individually, ERIC BOWEN,  
Individually, WILLIAM SCRIMA, Individually,  
WILLIAM WALSH, Individually, THOMAS  
CARPENTER, Individually, JOHN DOES  
1-5, Individually and JANE DOES 1-5,  
Individually, Acting Superintendent of the  
New York State Police STEVEN NIGRELLI,  
in his official capacity,

Defendants.

**NOTICE OF MOTION  
FOR STAY AND INJUNCTION  
PENDING APPEAL  
FRAP 8(a)(1)**

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PLEASE TAKE NOTICE that the plaintiffs, ZACHARY GIAMBALVO, JOHN  
MOUGIOS, SHANE MASHKOW, KEVIN MCLAUGHLIN, MICHAEL MCGREGOR,  
FRANK MELLONI, and RENAISSANCE FIREARMS INSTRUCTION, INC., will move this  
Court at the United States District courthouse located at 100 Federal Plaza, Central Islip, New  
York on the 9<sup>th</sup> day of March, 2023, as required by FRAP 8(a)(1) for an Order staying this Court's  
February 14, 2023 Memorandum and Order and granting Plaintiffs' requested injunctive relief  
pending the appeal of such Order, which denied Plaintiffs' motion for a Preliminary Injunction,  
and each and every part thereof that was and is contrary to and/or prejudiced the plaintiffs' rights,  
claims, and interests.

Pursuant to Local Rule 6.1(b), any opposing affidavits and answering memoranda shall be served within fourteen days after service of the moving papers, or on March 3, 2023; reply papers shall be served within seven days after service of the answering papers, or on March 10, 2023.

Dated: February 16, 2023  
Scarsdale, New York

THE BELLANTONI LAW FIRM, PLLC  
*Attorneys for Plaintiffs*

\_\_\_\_\_/s/\_\_\_\_\_  
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